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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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Recent events have indicated that the ITU treaty requirements for Amateur Radio will not be reviewed until WRC-2001, because of this I would like to suggest that the FCC through the Biennial committee open up for discussion changes to the Morse code Requirements in the U.S. The ARRL has used its multimillion dollar publishing concerns and influence in Washington to suppress this explosive issue for several years. The committee could level the playing field for the 560,000 Amateur operators, who are not ARRL members. Only 1 in 4 U.S. Amateurs are ARRL members and those numbers are declining rather than growing because of their pro-code stance. The code requirements have been used for years as a filter to limit access to frequencies below 30 MHz.

Many of us would like to see the following changes if possible:

1. Elimination of the Code requirements as a test element if that is not possible make it an optional requirement and provide an alternate route to gain the same privileges.
2. If we must have a CW test to meet ITU requirements until S25 can be eliminated or changed make it a 5WPM test that would grant full access to the operator once he or she had passed the appropriate written test. This would satisfy the ITU requirement and could act as an interim requirement until S25 could be eliminated from the ITU treaty.
3. Reduce the number of license classes from five to three. This would not only simplify testing but would save money since it would reduce the cost of record keeping and other administrative cost too numerous to mention in this response.
4. Have the FCC solicit a board of directors from the various well known Amateur Radio groups, publishers or related fields taking care not to let ARRL affiliated groups gain control of the Board, that will administer Amateur Radio and be accountable to the FCC for its actions.
5. Make changes to Part 97 regarding experimentation in Amateur Radio that will allow many of us to try new forms of communication such as high speed packet and spread spectrum techniques without the restrictive regulations that hinder experimentation on the bands now. Proper safeguards can be instigated that will ensure these operators do not interfere with legitimate communications if the regulations are structured properly.

These are only a few of the changes many of us would like to see in Amateur Radio. Please consider the following statement when making any Decisions regarding Amateur Radio. "The ARRL claims to represent the whole Amateur Radio Community." This is not true only 1 in 4 of the almost 800,000 licensed Amateurs are members of the ARRL. Most of these are concentrated in the Higher license classes, less than 1.2% of their membership is Novice, Tech and Tech+ which now compose almost 46% of the Amateur Radio Community. We have received almost no representation nor has the ARRL listened to our proposals. When we contact them to question their proposals or policy decisions we are told "If you want input into our decisions you must join the ARRL." This from an organization that claims to be the Voice of Amateur Radio and represent all Amateur operators. I hope the FCC will adopt procedures that will allow the 75% of us, who are not ARRL members to have the same chance to influence the future of Amateur Radio as the ARRL and other groups by considering our proposals.

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